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**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

PUREKANA, LLC, an Arizona limited liability  
company,

Plaintiff,

vs.

T1 PAYMENTS, LLC, a Nevada limited  
liability company,

Defendant.

CASE NO. 2:19-cv-01399-KJD-NJK

**DEFENDANT'S UNOPPOSED  
MOTION TO EXTEND DEADLINES**

**DEFENDANT'S UNOPPOSED MOTION TO EXTEND DEADLINES**  
**(First Request)**

Defendant T1 Payments, LLC respectfully moves, pursuant to Fed. R. Civ. P. 16(b)(4) and LR IA 6-1, to extend the deadlines for initial expert reports, rebuttal reports, and discovery as set forth below. This motion is unopposed by Plaintiff PureKana, LLC, and counter-defendant PJ Marketing, LLC. This is the first requested extension of deadlines.

Good cause exists to grant the requested extension. First, on January 20, 2020, T1 Payments learned that its expert could not accept the engagement for this matter. T1 Payments immediately began searching for a replacement expert witness and found one. But, because of prior obligations, the new expert witness will be unable to complete his report before the end of March 2020.

Second, the parties have confirmed March 24, 2020, for meditation in this matter which will require travel to Las Vegas by some of the parties and their counsel. March 24, 2020, is the first day that all of the parties, their counsel, and their preferred mediator, are available. Although

the parties have exchanged initial discovery requests and written discovery proceeds apace, the parties discussed that it is in their best interests to defer some discovery, including party depositions and expert discovery, until after mediation so that the parties may conserve resources and avoid wasting them if the case ultimately settles.

Third, T1 Payments is not seeking a stay of the proceedings. Rather, T1 Payments submits that the parties are currently cooperating with discovery which is ongoing. Among other things, T1 Payments has answered interrogatories and requests for production, and anticipates that PureKana and PJ Marketing will do the same when their responses are due in February. The parties are currently cooperating to engage in enough discovery to make mediation meaningful, while still moving the case forward.

Fourth, T1 Payments is not, by requesting this extension, seeking to unduly delay or prejudice the parties. The only extension of deadlines requested are those set forth below. Currently, no trial date has been set; therefore, extending these deadlines will not cause any change to the trial date or any other dates set forth on the court's scheduling order.

Good cause exists to grant this motion, as set forth fully above. Namely, granting the requested extension will permit the parties to focus on settling the litigation rather than litigating it simultaneously, thereby serving the best economic interests of the parties, and would allow parties to conserve their resources and those of the Court. T1 Payments states that the parties have worked cooperatively throughout the litigation and expect to continue to do so. Thus, in the interest of judicial economy and to preserve resources for both the Court and the parties, T1 Payments proposes, unopposed by PureKana and PJ Marketing, that existing deadlines be extended as follows:

Description	Current Deadline	Proposed Deadline
Initial Expert Disclosures	February 13, 2020	March 31, 2020
Rebuttal Expert Disclosures	March 16, 2020	April 20, 2020
Completion of Discovery	April 13, 2020	May 22, 2020

\*Dispositive motions due June 22, 2020

\*Joint proposed pretrial order due July 22, 2020, or 30 days after resolution of dispositive motions

T1 Payments states in further support of this motion:

1. In accordance with LR IA 6-1(a), the reasons for requesting an extension of deadlines are set forth fully above, and this is the first request for an extension of deadlines; and
2. In accordance with LR IA 6-2, “an ‘order’ in the form of a signature block on which the court or clerk can endorse approval of the relief sought” appears here below.

WHEREFORE, T1 Payments, unopposed by PureKana and PJ Marketing, respectfully requests that the Court:

- (A) Grant this motion, and extend the deadline as set forth above; and
- (B) Grant such other and further relief as the Court may deem just and equitable.

Dated this 28th day of January, 2020.

LARSON ZIRZOW KAPLAN & COTTNER

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IT IS SO ORDERED:

  
NANCY J. KOPPE  
United States Magistrate Judge

DATED: January 30, 2020